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10	UNITED STATES	DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA			
12	SAN FRANCISCO DIVISION			
13				
14	AUDLEY BARRINGTON LYON, JR., et. al.,	Case No.: 13-cv-05878 EMC		
15	Plaintiffs,	CECOND TOWN CHANG		
16	v.	SECOND JOINT STIPULATION EXTENDING EXPERT DISCOVERY		
17	UNITED STATES IMMIGRATION AND	CUT-OFF; [PRO POS ED] ORDER		
18	CUSTOMS ENFORCEMENT, et. al.,	CLASS ACTION		
	Defendants.			
19	The Parties to this action hereby agree to the following and seek an order extending			
20	expert discovery by an additional three (3) days.			
21	The current deadline to complete expert discovery is January 8, 2016. <i>See</i> Dkt. No. 117.			
22	The Parties have been diligently conducting experts	·		
23				
24	deposition for Defendants' rebuttal expert Michael Hackett on January 7, 2016. Unfortunately,			
25	Mr. Hackett has informed Defendants that he is dealing with a family medical crisis and will be			
26	unavailable the week of January 7. However, Mr. Hackett has represented to Defendants that he			
27	will be available the following week on Monday January 11, 2016.			
28				

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SECOND JOINT STIPULATION EXTENDING EXPERT DISCOVERY CUT-OFF Case No.: 13-cv-05878 EMC

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1	Accordingly, the parties seek a three (3) day extension of expert discovery to January 11,		
2	2016. This three-day extension of expert discovery will not affect any of the other current		
3	deadlines in this case.		
4	Dated: January 4, 2016 By: /s/ Julia Harumi Mass		
5	JULIA HARUMI MASS (SBN 189649)		
6	ANGÉLICA SALCEDA (SBN 296152) MICHAEL T. RISHER (SBN 191627)		
7	AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF NORTHERN CALIFORNIA		
8	39 Drumm Street		
	San Francisco, CA 94111 Telephone: (415) 621-2493		
9	Facsimile: (415) 255-8437		
10	Email: jmass@aclunc.org		
11	ORRICK, HERRINGTON & SUTCLIFFE LLP		
12	ROBERT P. VARIAN (SBN 107459) CHARLES J. HA (<i>pro hac vice</i>)		
	DAVID KEENAN (pro hac vice)		
13	JUDY KWAN (SBN 273930)		
1.4	ALEXIS YEE-GARCIA (SBN 277204)		
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17	AMERICAN CIVIL LIBERTIES UNION		
18	NATIONAL PRISON PROJECT		
10	CARL TAKEI (SBN 256229)		
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	Email: ctakei@aclu.org		
22	MARC VAN DER HOUT (SBN 80778)		
23	MEGAN SALLOMI (SBN 300580)		
24	180 Sutter Street		
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26	Email: msal@vblaw.com		
27	Attorneys for Plaintiffs		
28			

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SECOND JOINT STIPULATION EXTENDING EXPERT DISCOVERY CUT-OFF Case No.: 13-cv-05878 EMC

1	Dated: January 4, 2016	OFFICE OF IMMIGRATION LITIGATION,
2		CIVIL DIVISION U.S. DEPARTMENT OF JUSTICE
3		DENIAMINIC MIZED
4		BENJAMIN C. MIZER Principal Deputy Assistant Attorney General
5		WILLIAM C. PEACHEY
6		Director, District Court Section
7		ELIZABETH J. STEVENS
		Assistant Director, District Court Section
8		By: /s/ Brian C. Ward
9		BRIAN C. WARD
10		KATHERINE J. SHINNERS
		JENNIFER A. BOWEN Trial Attorneys, District Court Section
11		P.O Box 868, Ben Franklin Station
12		Washington, D.C. 20044
		Telephone: (202) 616-9121
13		Email: Brian.C.Ward@usdoj.gov
14		Attorneys for Defendants
15		
16	 I, Brian C. Ward, am the ECF user	whose user ID and password are being used to file this
17	Stipulation. In accordance with Lo	ocal Rule 5-1(i)(3), I hereby attest that the other signatories
	listed here have concurred in the fi	ling of this document.
18	Dated: January 4, 2016	By: /s/ Brian C. Ward
19		BRIAN C. WARD
20		
21		
22		[PROPOSED] ORDER TES DISTRICT
	[PROPOSED] ORDER TES DISTRICTOR PURSUANT TO STIPULATION, IT IS SO ORDERED.	
23		ORDERED E
24	January 6, 2016 Dated:	IT IS SO ORDE
25		HONORABLE EDW United States District
26		United States District Judge Edward M. Chen
27		
28		THE
		SECOND JOINT STRUCTION EXTENDING

EXPERT DISCOVERY CUT-OFF Case No.: 13-cv-05878 EMC

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